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March 23, 2016

Via ECF

Honorable Paul A. Crotty
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Chambers 1350
New York, New York 10007

Re: Tiffany Hsueh v. The New York State Department of Financial Services, et al.
15 cv 3401 (PAC)

Dear Judge Crotty:

This firm represents Plaintiff, Tiffany Hsueh, in the above-referenced action. For the following reasons, Plaintiff opposes the defense's request for two days to depose Plaintiff.

As you know, this matter arises from allegations of gender discrimination (sexual harassment). It is Plaintiff's position that the facts at issue in this action are such that one day for Plaintiff's deposition would be sufficient; the allegations in this case simply do not warrant an extra day for Plaintiff's deposition.

Notwithstanding the above, should Plaintiff's deposition reveal that another day (or additional time) is reasonably warranted based on that which is (or is not) covered during Plaintiff's deposition, it would appear more reasonable to consider a request for a second day of deposition at that time. However, at this time, the default of seven hours for Plaintiff's deposition should apply.

Thank you for your attention to this matter.

Respectfully submitted,

/s/
Joshua P. Frank, Esq. (JF1981)

cc: Eva Deitz, Esq. (via ECF)
cc: Albert Rizzo, Esq. (via ECF)